

RE: EBONI M ARMOUR FRALEY

) Case No. 19 B 28445
)
Debtor) Chapter 13
)
) Judge: DONALD R CASSLING

NOTICE OF MOTION

EBONI M ARMOUR FRALEY

DAVID M SIEGEL

via Clerk's ECF noticing procedures

9199 S BURNSIDE
CHICAGO, IL 60619

Please take notice that on January 09, 2020 at 10:00 am my designee or I will appear before the Honorable Judge DONALD R CASSLING at 219 South Dearborn Courtroom 619, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on December 09, 2019.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On October 07, 2019 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend D - Consumer Portfolio not in plan; amend plan - #2.2 - blank; #5.1 - also check 3rd box and plan not feasible.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,

/s/ Tom Vaughn

TOM VAUGHN
CHAPTER 13 TRUSTEE
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